



Driving progress
through partnership

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July 21, 2025

Via ECF

Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Eletson Holdings, Inc. v. Levona Holdings Ltd.*, Civil No. 23-cv-7331 (LJL)

Dear Judge Liman:

On behalf of Reed Smith and Eletson Holdings as Reed Smith is being permitted to represent that entity in the Second Circuit, we write briefly to respond to the letter to Your Honor from counsel to Levona on Friday evening (ECF 507).

First, the Levona letter misstates that the Court of Appeals has assigned the application to a three-judge panel in the “ordinary course”. The Order nowhere says that. Levona and Goulston each filed full-length briefs seeking to dismiss the application. The Court of Appeals rejected those efforts, did not dismiss the application, and is proceeding to move the application to a three-judge panel for prompt review and decision. Reed Smith and our client will be filing a reply on that motion, and we believe the Circuit will act on the application expeditiously, not in the “ordinary course”.

Second, whether or not the current single Judge felt she could grant the interim application, this Court and Levona/Goulston’s client remain under the June 25 stay order, which prohibits any effort by those parties to access the Eletson file (we believe directly or indirectly) and prohibits any effort to obtain the exact same privileged communications that Goulston has now admitted it has (highly improperly in our view) accessed. This Court and those parties remain under the specific Circuit Order that this Court should protect the privileged documents that Goulston is certainly not protecting.

Respectfully submitted,

Louis M. Solomon

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cc: Counsel of Record (via ECF)